

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and )	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated, )	
Plaintiff, )	Honorable Aleta A. Trauger
vs. )	LEAD PLAINTIFF'S MOTION TO EXTEND
CORRECTIONS CORPORATION OF )	DEADLINE FOR THIRD PARTIES TO
AMERICA, et al., )	JUSTIFY CONTINUED SEALING OF
Defendants. )	CERTAIN DOCUMENTS
_____ )	

On October 26, 2018, Lead Plaintiff Amalgamated Bank, as Trustee for the LongView Collective Investment Fund (“Plaintiff”), moved the Court for leave to file under seal an unredacted version of Plaintiff’s reply in further support of its motion for class certification, appointment of class representative and appointment of counsel and certain exhibits to that reply. ECF No. 119 (“Motion to Seal”).

On October 29, 2018, the Court granted Plaintiff’s Motion to Seal and ordered the designating party of any “Confidential” document filed under seal, to file a motion justifying its continued sealing on or before November 2, 2018. *See* ECF Nos. 119-1, 123 (the “Sealing Order”).

Among the exhibits filed under seal pursuant to the Court’s Sealing Order were three documents that had been designated “Confidential” by third parties Akin Gump Strauss Hauer & Feld LLP and The GEO Group, Inc. *See* ECF Nos. 122-20, 122-21, 122-23 (the “Sealed Documents”).

Counsel for Plaintiff inadvertently notified counsel for these third parties of the sealed filing on November 5, 2018 – after the November 2, 2018 deadline for substantiating continued sealing set by the Court. *See* Sealing Order.

In order to allow these third parties an opportunity to consider whether they wish to file a motion justifying continued sealing, Plaintiff respectfully requests that the Court enter an order, substantially in the form of the [Proposed] Order filed contemporaneously herewith, allowing these third parties to file any motion for continued sealing on or before November 16, 2018, and maintaining the Sealed Documents under seal until such time.

DATED: November 6, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on November 6, 2018, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

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